

Decision \_\_\_\_\_

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Own Motion to address the issue of customers' electric and natural gas service disconnection.

Rulemaking 10-02-005  
(Filed February 4, 2010)

**DECISION GRANTING COMPENSATION TO THE UTILITY REFORM NETWORK FOR SUBSTANTIAL CONTRIBUTION TO DECISION 14-06-036**

|  |  |
|--|--|
| <b>Intervenor: The Utility Reform Network (TURN)</b> | <b>For contribution to Decision (D.) 14-06-036</b> |
| <b>Claimed: \$ 44,342.34</b>                         | <b>Awarded: \$44,762.33<sup>1</sup></b>            |
| <b>Assigned Commissioner: Michel Peter Florio</b>    | <b>Assigned ALJ: Maryam Ebke</b>                   |

**PART I: PROCEDURAL ISSUES**

|  |   |
|--|---|
| <b>A. Brief description of Decision:</b> | In D.14-06-036 the Commission approved the Residential Disconnection Settlement Agreement submitted on April 1, 2014, by the Office of Ratepayer Advocates (ORA), The Utility Reform Network (TURN), the Greenlining Institute, the Center for Accessible Technology (CforAT), Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) (collectively, the Settling Parties), which extends many disconnection and credit and collections-related rules adopted by the Commission in earlier decisions in this proceeding and enacts new pilot program protocols to experiment with different approaches to payment plans. |
|--|---|

**B. Claimant must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:**

|   | <b>Intervenor</b> | <b>CPUC Verified</b> |
|---|-------------------|----------------------|
| <b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b> |                   |                      |
| 1. Date of Prehearing Conference (PHC):   | N/A               |                      |

<sup>1</sup> This increase from the amount requested is due to application of cost-of-living adjustments.

|   |                 |     |
|---|-----------------|-----|
| 2. Other specified date for NOI:  | March 8, 2010   | Yes |
| 3. Date NOI filed:  | March 5, 2010   | Yes |
| 4. Was the NOI timely filed?  |                 | Yes |
| <b>Showing of customer or customer-related status (§ 1802(b)):</b>      |                 |     |
| 5. Based on ALJ ruling issued in proceeding number:                     | R.10-02-005     | Yes |
| 6. Date of ALJ ruling:  | March, 29, 2010 | Yes |
| 7. Based on another CPUC determination (specify):                       |                 |     |
| 8. Has the Intervenor demonstrated customer or customer-related status? |                 | Yes |
| <b>Showing of "significant financial hardship" (§ 1802(g)):</b>         |                 |     |
| 9. Based on ALJ ruling issued in proceeding number:                     | R.10-02-005     | Yes |
| 10. Date of ALJ ruling:   | March, 29, 2010 | Yes |
| 11. Based on another CPUC determination (specify):                      |                 |     |
| 12. Has the Intervenor demonstrated significant financial hardship?     |                 | Yes |
| <b>Timely request for compensation (§ 1804(c)):</b>                     |                 |     |
| 13. Identify Final Decision:  | D.14-06-036     | Yes |
| 14. Date of issuance of Final Order or Decision:                        | June 30, 2014   | Yes |
| 15. File date of compensation request:                                  | August 29, 2014 | Yes |
| 16. Was the request for compensation timely?                            |                 | Yes |

## PART II: SUBSTANTIAL CONTRIBUTION

### A. Claimant's description of its contribution to the final decision (*see* § 1802(i), § 1803(a), and D.98-04-059).

| Intervenor's Claimed Contribution(s)   | Specific References to Intervenor's Claimed Contribution(s) | CPUC Discussion   |
|--|---|---|
| 1. TURN's efforts, in conjunction with those of ORA, CforAT, and the Greenlining Institute (collectively, the Consumer Groups), resulted in an important Settlement Agreement with PG&E, SCE, SDG&E and SoCalGas (collectively, the Utilities), which the Commission adopted in D.14-06-036. As detailed further below, the Settlement Agreement addresses | D.14-06-036, Ordering Paragraph 1.                          | Yes. Turn's representation of the terms of the settlement approved in D.14-06-036 is accurate and its description of its prior litigation positions is also accurate. Pursuant to (D.) 94-10-029, the |

|   |  |   |
|---|--|---|
| <p>the disconnection and credit/collections-related practices to be implemented by the Utilities after the expiration of the related policies adopted by the Commission in D.10-12-051 and D.12-03-054 at the end of 2013.</p> <p>TURN participated actively in all aspects of the process that lead to the Commission’s adoption of the Settlement Agreement in D.14-06-036, including taking the lead on most aspects of the Consumer Groups’ participation, including: organizing the Consumer Groups and seeking to develop consensus, developing strategy, drafting and editing offers to the utilities and negotiating terms, and advocating for and defending the Settlement Agreement once submitted to the Commission.</p> <p>Settlement negotiations commenced under unusual circumstances; there was no litigation underway, and this proceeding was officially closed. However, the looming expiration of most of the consumer protections adopted by the Commission in D.10-12-051 and D.12-03-054 motivated the Settling Parties to try to seek consensus on the successor policies to be implemented by the Utilities post-2013. As a result of this unusual procedural context, TURN cannot point to pleadings that indicate TURN’s litigation position on post-2013 policies, as we would normally do to allow the Commission to infer the causal relationship between TURN’s positions and the ultimate settled outcomes. However, for some of these issues TURN can point to the</p> |  | <p>Commission has discretion to award compensation to parties who participated in settlement agreements, when there is a finding that they made a substantial contribution to a decision. We find that TURN’s participation in the settlement made a substantial contribution to D.14-06-036.</p> |
|---|--|---|

|   |  |            |
|---|--|------------|
| <p>Commission’s prior decisions in this proceeding awarding TURN intervenor compensation, which document the positions taken by TURN in earlier phases of R.10-02-005 that are related to the issues resolved in the Settlement Agreement. We provide those references below.</p> <p>For all of these reasons, TURN submits that the Commission should find that D.14-06-036 and the Settlement Agreement it adopted reflect TURN's substantial contribution.</p>   |  |            |
| <p>The Settlement Agreement includes the following key components:</p> <ul style="list-style-type: none"> <li>• A continuation of the requirement for in-person visits to special needs profiled customers, including Medical Baseline, Life Support, and customers self-certifying that they have a serious illness or condition that could become life-threatening if service is disconnected, for SDG&amp;E and SoCalGas. (PG&amp;E and SCE are already subject to this requirement by one of the few non-expiring provisions of D.12-03-054);</li> <li>• An extension of most of the effective communications policies required by D.10-12-051 and D.12-03-054, and an expansion of requirements regarding in-language communications and accessible communications for people with language disabilities.</li> <li>• A commitment from SDG&amp;E and SoCalGas to seek funding</li> </ul> | <p><u>In-Person Visits:</u><br/>D.14-06-036, Attachment A, Section 4.1</p> <p><i>Compare with</i> TURN Litigation position, as explained in D.13-03-027 (awarding TURN compensation for two earlier decisions in this proceeding), pp. 5-8.</p> <p><u>Effective Communications:</u><br/>D.14-06-036, Attachment A, Section 4.2</p> <p><i>Compare with</i> TURN Litigation position, as explained in D.10-12-015 (awarding TURN compensation for D.10-07-048 issued earlier in this proceeding), p. 7.</p> <p><u>CARE Enrollment by Phone:</u><br/>D.14-06-036, Attachment A,</p> | <p>Yes</p> |

|  |   |  |
|--|---|--|
| <p>in the next Low Income Programs proceeding for CARE enrollment by telephone. (PG&amp;E and SCE were required to offer CARE enrollment by telephone by D.12-03-054 on an ongoing basis.)</p> <ul style="list-style-type: none"> <li>• A series of pilot programs to be implemented by each Utility to test various approaches to reducing pay plan defaults and decreasing overall outstanding arrears.</li> <li>• A continuation of the prohibition on re-establishment of credit deposits for late payment by CARE/FERA customers, and a requirement that CARE/FERA customers be offered the opportunity to amortize other re-establishment of credit deposits for either three or six months, depending on the amount of the deposit.</li> <li>• Reporting requirements related to disconnections and arrearages, including quarterly reports containing monthly data to be submitted in R.10-02-005 by the Utilities.</li> <li>• And semi-annual stakeholder dialogues between the Utilities and the Consumer Groups to discuss the impacts of the policies implemented pursuant to the Settlement Agreement.</li> </ul> | <p>Section 4.3</p> <p><i>Compare with</i> TURN Litigation position, as explained in D.13-03-027 (awarding TURN compensation for two earlier decisions in this proceeding), p. 6.</p> <p><u>Payment Arrangements:</u></p> <p>D.14-06-036, Attachment A, Section 4.4</p> <p><i>Compare with</i> TURN Litigation position, as explained in D.13-03-027 (awarding TURN compensation for two earlier decisions in this proceeding), p. 7.</p> <p><u>Credit Deposits:</u></p> <p>D.14-06-036, Attachment A, Section 4.4.10</p> <p><i>Compare with</i> TURN Litigation position, as explained in D.10-12-015 (awarding TURN compensation for D.10-07-048 issued earlier in this proceeding), p. 2.</p> <p><u>Reporting Requirements:</u></p> <p>D.14-06-036, Attachment A, Section 4.4.11.1</p> <p><i>Compare with</i> TURN Litigation position, as explained in D.10-12-015 (awarding TURN compensation for D.10-07-048 issued earlier in this proceeding), pp. 5-6.</p> <p><u>Stakeholder Dialogue:</u></p> <p>D.14-06-036, Attachment A, Section 4.4.11.2</p> |  |
|--|---|--|

|  |  |     |
|--|--|-----|
| <p>2. TURN, in conjunction with the other Settling Parties, demonstrated that the Commission should not require the Utilities to add new tariff language, beyond the tariff changes already required by the terms of the Settlement Agreement, contrary to the recommendations of the National Consumer Law Center (NCLC).</p> | <ul style="list-style-type: none"> <li>• Reply of ORA, TURN, The Greenlining Institute, CforAT, PG&amp;E, SCE, SDG&amp;E, and SoCalGas to the Response of NCLC to the Joint Motion for Adoption of the Settlement, pp. 2-3;</li> <li>• D.14-06-036, Ordering Paragraph 2 (directing the Utilities to implement only the changes to their tariffs required by the Settlement Agreement).</li> </ul> | Yes |
| <p>3. TURN, in conjunction with the other Settling Parties, demonstrated that the Settlement Agreement need not be modified to explicitly incorporate flexibility in payment arrangements and extensions, as such flexibility already exists in the Agreement.</p>   | <ul style="list-style-type: none"> <li>• Reply of ORA, TURN, The Greenlining Institute, CforAT, PG&amp;E, SCE, SDG&amp;E, and SoCalGas to the Response of NCLC to the Joint Motion for Adoption of the Settlement, pp. 3-4;</li> <li>• D.14-06-036, Findings of Fact 7, 8.</li> </ul>  | Yes |
| <p>4. TURN, in conjunction with the other Settling Parties, demonstrated that the Proposed Decision should be modified to more accurately characterize D.12-03-054.</p>  | <ul style="list-style-type: none"> <li>• TURN et al. Cmts on Proposed Decision (6-16-14), pp. 1-2;</li> <li>• <i>Compare</i> D.14-06-036, Finding of Fact 2, <i>with</i> Proposed Decision, Finding of Fact 2.</li> </ul>  | Yes |
| <p>5. TURN, in conjunction with the other Settling Parties, demonstrated that the Proposed Decision should be modified to correct an inaccurate characterization of D.10-12-051.</p>   | <ul style="list-style-type: none"> <li>• TURN et al. Cmts on Proposed Decision (6-16-14), p. 3;</li> <li>• <i>Compare</i> D.14-06-036, Finding of Fact 6, <i>with</i> Proposed Decision, Finding of Fact 6.</li> </ul>   | Yes |
| <p>6. TURN, in conjunction with the other Settling Parties, demonstrated that the Proposed Decision should be modified to strengthen the</p>   | <ul style="list-style-type: none"> <li>• TURN et al. Cmts on Proposed Decision (6-16-14), pp. 3-4;</li> <li>• <i>Compare</i> D.14-06-036, p. 5,</li> </ul>   | Yes |

|   |   |     |
|---|---|-----|
| support for Finding of Fact 6 by mentioning the Settling Parties' intent that the Utilities continue to implement the permanent provisions of D.12-03-054.  | <i>with</i> Proposed Decision, p. 4.  |     |
| 7. TURN, in conjunction with the other Settling Parties, demonstrated that the Proposed Decision should be modified to more thoroughly discuss the Settlement Agreement's treatment of payment plan flexibility.                                | <ul style="list-style-type: none"> <li>• TURN et al. Cmts on Proposed Decision (6-16-14), p. 4;</li> <li>• <i>Compare</i> D.14-06-036, p. 5, <i>with</i> Proposed Decision, p. 4. <i>See also</i> Finding of Fact 8 added to the Proposed Decision in D.14-06-036.</li> </ul> | Yes |
| 8. TURN, in conjunction with the other Settling Parties, demonstrated that the Proposed Decision should be modified to lend additional clarity to the context for the Settlement Agreement by adding a discussion of the effect of D.10-12-051. | <ul style="list-style-type: none"> <li>• TURN et al. Cmts on Proposed Decision (6-16-14), pp. 4-5;</li> <li>• <i>Compare</i> D.14-06-036, Section 2 (Background), p. 2, <i>with</i> Proposed Decision, Section 2 (Background).</li> </ul>                                     | Yes |

**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

|   | <b>Intervenor's Assertion</b> | <b>CPUC Discussion</b> |
|---|-------------------------------|------------------------|
| <b>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?<sup>2</sup></b>  | Yes                           | Yes                    |
| <b>b. Were there other parties to the proceeding with positions similar to yours?</b>   | Yes                           | Yes                    |
| <b>c. If so, provide name of other parties:</b> CforAT and the Greenlining Institute were also Settling Parties. The National Consumer Law Group, another organization with interests generally similar to TURN's, did not join the Settlement Agreement but filed responsive pleadings.  |                               | Yes                    |
| <b>d. Intervenor's claim of non-duplication:</b><br><br>From the outset of this proceeding, TURN has been coordinating our coverage of issues with ORA and the other Consumer Groups to avoid duplication to the extent possible. This active coordination continued throughout the time period covered by this request for compensation. |                               | Yes                    |

<sup>2</sup> The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

|  |  |
|--|--|
| <p>As a result of agreements reached among the Consumer Groups, TURN took the lead in many aspects of settlement negotiations, including: working with ORA, CforAT, Greenlining (and initially NCLC) to achieve consensus where possible before approaching the Utilities to discuss post-2013 disconnection-related policies; drafting documents used during negotiations; and playing a coordination role among the Settling Parties throughout settlement negotiations. TURN also took the lead in drafting documents on behalf of the Settling Parties related to the defense of the proposed Settlement Agreement, including responses to data requests propounded by NCLC and responses to NCLC’s pleadings. Finally, TURN took the lead in drafting comments on the Proposed Decision on behalf of the Settling Parties. As a result of this allocation of work, TURN incurred more time than the other Consumer Groups but created efficiencies for all other parties.</p> <p>For all of these reasons, TURN submits that there was no undue duplication between TURN’s participation and that of ORA and the other Consumer Groups.</p> |  |
|--|--|

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**

**A. General Claim of Reasonableness (§ 1801 and § 1806):**

|   |  |
|---|--|
| <p><b>a. Intervenor’s claim of cost reasonableness:</b></p> <p>TURN’s request for intervenor compensation seeks an award of approximately \$44,000 as the reasonable cost of our participation in this final phase of this proceeding leading to the Settlement Agreement adopted in D.14-06-036. TURN submits that these costs are reasonable in light of the importance of the issues TURN addressed and the benefits to customers.</p> <p>TURN's advocacy reflected in D.14-06-036 addressed policy matters rather than specific rates or disputes over particular dollar amounts. For the most part, TURN cannot easily identify precise monetary benefits to ratepayers from our work in related to D.14-06-036, given the nature of the issues presented. TURN submits that its positive impact however, will afford residential customers expanded opportunities to avoid service termination and to continue receiving gas and electricity services. Because utility shutoffs trigger all kinds of financial impacts, including service reinstatement costs, food spoilage and replacement costs, and possibly eviction, in addition to a host of health and safety issues, policies that assist consumers in being able to pay their bills, manage arrearages, and avoid shutoffs bestow enormous benefits upon those Californians most in need of assistance. <i>See, e.g.,</i> D.10-12-015, p. 12.</p> | <p><b>CPUC Verified</b></p> <hr/> <p>Yes</p> |
| <p><b>b. Reasonableness of hours claimed:</b></p> <p>This Request for Compensation includes approximately 132 total hours for</p>   | <p>After a minor adjustment as set</p>       |

| <p>TURN’s attorney time, or the equivalent of just over three weeks of full-time work by a single person. TURN submits that this is a reasonable amount of time, given the duration of settlement negotiations and the leading role played by TURN throughout that process.</p> <p>TURN’s request is also reasonable because we were efficient in staffing this proceeding and pursuing our results. At all times, this proceeding was staffed by a single attorney, TURN staff attorney Hayley Goodson, who is the TURN attorney most familiar with the issues addressed in the Settlement Agreement. Ms. Goodson has been TURN’s attorney throughout the duration of this proceeding.</p> <p>While the majority of TURN’s hours were associated with the Settlement Agreement, TURN also includes in this request approximately 10 hours for work related to the implementation of D.10-12-051 (primarily attending the quarterly meetings between the parties to the settlement agreement adopted in that decision), the implementation of D.12-03-054 (reviewing changes to tariffs and collection-related policies proposed by PG&amp;E and SCE), and SDG&amp;E’s proposed change to its disconnection notice policies earlier this year. The Commission has on many occasions awarded intervenor compensation for work that relates to the implementation of an earlier Commission decision, such as in D.13-03-027, which awarded TURN compensation for similar implementation work in this proceeding.</p> <p>TURN’s request also includes 7.25 hours devoted to the preparation of this request for compensation. This is a reasonable figure consistent with the relatively straight-forward nature of this request.</p> | <p>forth in Section III.C below, the remainder of this request for compensation is reasonable and worthy of compensation.</p>   |                    |                    |      |  |       |                  |   |       |                  |   |       |  |
|--|---|--------------------|--------------------|------|--|-------|------------------|---|-------|------------------|---|-------|--|
| <p><b>c. Allocation of hours by issue:</b></p> <p>TURN has allocated its daily time entries by activity codes to better reflect the nature of the work reflected in each entry. TURN has used the following activity codes:</p> <table border="1" data-bbox="237 1352 1170 1873"> <thead> <tr> <th>Code</th> <th>Description</th> <th>Allocation of Time</th> </tr> </thead> <tbody> <tr> <td>Comp</td> <td>Work related to the preparation of this request for compensation</td> <td>5.50%</td> </tr> <tr> <td>D.10-12-051-Impl</td> <td>Work related to the implementation of the Settlement Agreement adopted by the Commission in D.10-12-051 (Quarterly meetings between the Sempra Utilities and Consumer Groups) that occurred after TURN's last request for compensation in this proceeding</td> <td>3.23%</td> </tr> <tr> <td>D.12-03-054-Impl</td> <td>Work related to the implementation of the policies adopted in D.12-03-054 by PG&amp;E and SCE (proposed tariff changes, bill inserts)</td> <td>3.23%</td> </tr> </tbody> </table>   | Code  | Description        | Allocation of Time | Comp | Work related to the preparation of this request for compensation | 5.50% | D.10-12-051-Impl | Work related to the implementation of the Settlement Agreement adopted by the Commission in D.10-12-051 (Quarterly meetings between the Sempra Utilities and Consumer Groups) that occurred after TURN's last request for compensation in this proceeding | 3.23% | D.12-03-054-Impl | Work related to the implementation of the policies adopted in D.12-03-054 by PG&E and SCE (proposed tariff changes, bill inserts) | 3.23% | <p>TURN properly has allocated its time by issue in this proceeding.</p> |
| Code   | Description   | Allocation of Time |                    |      |  |       |                  |   |       |                  |   |       |  |
| Comp   | Work related to the preparation of this request for compensation  | 5.50%              |                    |      |  |       |                  |   |       |                  |   |       |  |
| D.10-12-051-Impl   | Work related to the implementation of the Settlement Agreement adopted by the Commission in D.10-12-051 (Quarterly meetings between the Sempra Utilities and Consumer Groups) that occurred after TURN's last request for compensation in this proceeding | 3.23%              |                    |      |  |       |                  |   |       |                  |   |       |  |
| D.12-03-054-Impl   | Work related to the implementation of the policies adopted in D.12-03-054 by PG&E and SCE (proposed tariff changes, bill inserts)   | 3.23%              |                    |      |  |       |                  |   |       |                  |   |       |  |

|              |   |                |  |
|--------------|---|----------------|--|
| Dxn-Notice   | Work related to reviewing SDG&E's 2014 Advice Letter re: changes to disconnection notices   | 0.76%          |  |
| Post-2013    | All efforts related to settlement negotiations and preparation of documents filed with the Commission advocating approval of the Settlement Agreement | 82.54%         |  |
| Post-2013-PD | Work related to reviewing and commenting on the 5/27/14 Proposed Decision   | 4.74%          |  |
| <b>Total</b> |   | <b>100.00%</b> |  |

If the Commission believes that a different approach to issue-specific allocation is warranted here, TURN requests the opportunity to supplement this section of the request.

**B. Specific Claim:\***

| CLAIMED                             |      |       |         |   |             | CPUC AWARD                   |         |             |
|-------------------------------------|------|-------|---------|---|-------------|------------------------------|---------|-------------|
| ATTORNEY, EXPERT, AND ADVOCATE FEES |      |       |         |   |             |                              |         |             |
| Item                                | Year | Hours | Rate \$ | Basis for Rate*   | Total \$    | Hours                        | Rate \$ | Total \$    |
| Hayley Goodson, TURN Attorney       | 2012 | 3.25  | \$325   | D.13-08-022, issued in A.10-11-015 <sup>3</sup>   | \$1,056.25  | 3.25                         | \$325   | \$1,056.25  |
| Hayley Goodson, TURN Attorney       | 2013 | 56.25 | \$345   | 2012 Rate approved in D.13-08-022, increased by 2% COLA for 2013 approved in Resolution ALJ-287, plus 5% step increase. See Comment #1. | \$19,406.25 | 56.25                        | \$345   | \$19,406.25 |
| Hayley Goodson, TURN Attorney       | 2014 | 65.00 | \$345   | Hourly rate requested for 2013. See Comment #1 (rate should be increased per any COLA adopted for 2014) <sup>4</sup>                    | \$22,425.00 | 64.25                        | \$355   | \$22,808.75 |
| <b>Subtotal: \$42,887.50</b>        |      |       |         |   |             | <b>Subtotal: \$43,271.25</b> |         |             |

<sup>3</sup> See also D.15-01-017.

<sup>4</sup> The 2014 hourly rate includes a cost-of-living increase for 2014 of 2.58% authorized in Resolution ALJ -303.

| INTERVENOR COMPENSATION CLAIM PREPARATION **   |              |  |          |  |            |   |          |            |
|--|--------------|--|----------|--|------------|---|----------|------------|
| Item   | Year         | Hours  | Rate \$  | Basis for Rate*  | Total \$   | Hours   | Rate     | Total \$   |
| Hayley Goodson, TURN Attorney  | 2014         | 7.25   | \$172.50 | ½ of hourly rate requested for 2013. See Comment #1 (rate should be increased per any COLA adopted for 2014) | \$1,250.63 | 7.25  | \$177.50 | \$1,286.87 |
| <b>Subtotal: \$1,250.63</b>  |              |  |          |  |            | <b>Subtotal: \$1,286.87</b>   |          |            |
| COSTS  |              |  |          |  |            |   |          |            |
| #  | Item         | Detail   |          |  | Amount     | Amount  |          |            |
|  | Photocopying | Expenses associated with copying pleadings related to D.14-06-036 and settlement-related documents   |          |  | \$9.80     | \$9.80  |          |            |
|  | Postage      | Expenses associated with mailing pleadings related to D.14-06-036  |          |  | \$4.76     | \$4.76  |          |            |
|  | Telephone    | Telephone expenses associated with settlement negotiations, including hosting conference calls for parties participating in negotiations remotely (thus avoiding travel costs) |          |  | \$189.65   | \$189.65  |          |            |
| <b>Subtotal:\$204.21</b>   |              |  |          |  |            | <b>Subtotal: \$204.21</b>   |          |            |
| <b>TOTAL REQUEST: \$44,342.34</b>  |              |  |          |  |            | <b>TOTAL AWARD: \$44,762.33</b>   |          |            |
| <p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate</p> |              |  |          |  |            |   |          |            |
| ATTORNEY INFORMATION   |              |  |          |  |            |   |          |            |
| Attorney   |              | Date Admitted to CA BAR <sup>5</sup>   |          | Member Number  |            | Actions Affecting Eligibility (Yes/No?)<br>If "Yes", attach explanation |          |            |
| Hayley Goodson   |              | December 5, 2003   |          | 228535   |            | No  |          |            |

<sup>5</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

**C. CPUC Disallowances and Adjustments:**

| Item | Reason   |
|------|--|
| 1    | <p><b>Hourly Rates for TURN Attorney Hayley Goodson</b></p> <p><b><u>2013</u></b></p> <p>For Goodson’s work in 2013, TURN seeks an hourly rate of \$345, an increase over the \$325 hourly rate adopted by the Commission in D.13-08-022 for her work in 2012. TURN has adjusted Goodson’s 2012 hourly rate of \$325 by two factors in arriving at the requested 2013 rate. The first is the general 2% COLA authorized in Resolution ALJ-287 for 2013. The second is a 5% step increase (the first step increase requested in this category), following Goodson’s move to the 8-12 years experience tier in 2011. These two increases yield a \$345 hourly rate, within the range of \$310-\$365 established in Resolution ALJ-287 for an attorney with Goodson’s experience.</p> <p><b><u>2014</u></b></p> <p>For Goodson’s work in 2014, TURN seeks the same hourly rate as for her work in 2013 because at the time of the submission of this request for compensation, the Commission has not adopted a general COLA for 2014. We apply the 2.58 % COLA to Goodson’s hourly rate as set forth in Resolution ALJ-303, and approve a 2014 hourly rate of \$455 for Goodson.</p> |
| 2    | <p><b>Goodson’s hours spent in 2014</b></p> <p>We reduce Goodson’s hours claimed in 2014 by 0.75 for work performed on 6/26/14, as this work occurred on the same day the Commission adopted D.14-06-036 and thus did not contribute to it.</p>  |

**PART IV: OPPOSITIONS AND COMMENTS**

|   |     |
|---|-----|
| <b>A. Opposition: Did any party oppose the Claim?</b>                                 | No  |
| <b>B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?</b> | Yes |

**FINDINGS OF FACT**

1. TURN has made a substantial contribution to Decision 14-06-036.
2. The requested hourly rates for TURN’s representatives , as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$44,762.33.

**CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

**ORDER**

1. The Utility Reform Network shall be awarded \$44,762.33.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall pay The Utility Reform Network their respective shares of the award, based on their California-jurisdictional electric and gas revenues for the 2014 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 12, 2014, the 75<sup>th</sup> day after the filing of The Utility Reform Network's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**APPENDIX****Compensation Decision Summary Information**

|                                  |   |                              |
|----------------------------------|---|------------------------------|
| <b>Compensation Decision:</b>    |   | <b>Modifies Decision?</b> No |
| <b>Contribution Decision(s):</b> | D1406036  |                              |
| <b>Proceeding(s):</b>            | R1002005  |                              |
| <b>Author:</b>                   | ALJ Ebke  |                              |
| <b>Payer(s):</b>                 | Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company |                              |

**Intervenor Information**

| <b>Intervenor</b>                 | <b>Claim Date</b> | <b>Amount Requested</b> | <b>Amount Awarded</b> | <b>Multiplier</b> | <b>Reason Change/Disallowance</b>  |
|-----------------------------------|-------------------|-------------------------|-----------------------|-------------------|--|
| The Utility Reform Network (TURN) | 8/29/2014         | \$44,342.34             | \$44,762.33           | n/a               | Application of cost-of-living adjustment; minor reduction in 2014 hours claimed. |

**Advocate Information**

| <b>First Name</b> | <b>Last Name</b> | <b>Type</b> | <b>Intervenor</b> | <b>Hourly Fee Requested</b> | <b>Year Hourly Fee Requested</b> | <b>Hourly Fee Adopted</b> |
|-------------------|------------------|-------------|-------------------|-----------------------------|----------------------------------|---------------------------|
| Haley             | Goodson          | Attorney    | TURN              | \$325                       | 2012                             | \$325                     |
| Haley             | Goodson          | Attorney    | TURN              | \$345                       | 2013                             | \$345                     |
| Haley             | Goodson          | Attorney    | TURN              | \$345                       | 2014                             | \$355                     |

**(END OF APPENDIX)**